REMARKS

I. INTRODUCTION

In response to the Office Action dated August 12, 2003, the claims have not been amended. Claims 1-45 remain in the application. Re-consideration of the application is requested.

II. PRIOR ART REJECTIONS

A. Claim 1

In paragraph (10) of the Office Action, claim 1 was rejected under 35 U.S.C. §103(a) as being unpatentable over Burrows and further in view of Wishnie as follows:

> In considering claim 1,
> Burrows et al. discloses an Internet web site, comprising:
> an online service, implemented on a computer, for building, design, and construction personnel, wherein the files comprise drawings, documents, communications, and tasks related to the architectural projects (see Fig. 2, Design Tool Executables 37; col. 4, lines 5-15 and lines 33-40).
> Additionally,
> Wishnie et al. discloses an Internet web site comprising:
> an online service that provides an integrated project workspace for organizing folders therein as containers for storing, managing, and sharing files for one or more projects, and the integrated project workspace provides relevant content, services, and tools to help the personnel manage the files related to the projects (see Fig. 4a, hierarchial display space 402; col. 4, lines 23-38; Fig. 4, textual display space 404; col. 4, lines 39-49).

Applicants respectfully traverse these rejections for one or more of the following reasons:

(1) Neither Burrows nor Wishnie teach, disclose, or suggest an integrated project workspace for organizing folders for one or more architectural projects; and

(2) Neither Burrows nor Wishnie teach, disclose, or suggest an integrated project workspace to help personnel (i.e., building, design, and construction personnel) manage files related to architectural projects.

Independent claim 1 provides for online services for particular personnel – building, design, and construction personnel. The online service provides an integrated project workspace. The workspace is utilized for organizing folders as containers for storing, managing, and sharing files for architectural projects. The files further comprise drawings, documents, communications, and tasks related to the architectural projects. Additionally, the integrated project workspace provides relevant content, services, and tools to help the personnel (as described above) manage the files related to the architectural projects.

Burrows was utilized to teach some of the claim elements. Wishnie was utilized to teach the integrated project workspace claim elements. However, contrary to the assertion in the Office Action, Wishnie does not even remotely read on or teach these claim elements. Wishnie is

specifically directed towards a file hierarchy for HTML files utilized to build a web site (see Title and Abstract). Fig. 4a of Wishnie (as described in col. 4, lines 22-50) provides a hierarchical display space 402 and textual display space 404 that illustrates a selected web site in a tree fashion showing the various pages of the web site. The entry in the hierarchical display space 402 has a point that points to the HTML file for a particular entry. The textual display space 404 has a textual description of attributes for each page in the web site. Accordingly, Wishnie is directed towards organizing HTML files for a web site.

In view of the above, Wishnie's web site and methodology is not directed towards or utilized by building, design, and construction personnel as claimed. The claims specifically provide that the integrated project workspace provides content, services, and tools to help such building, design, and construction personnel. Instead of being directed towards such particular personnel, Wishnie is directed towards personnel desiring to create and organize files for a web site.

Additionally, the claimed integrated workspace is related to architectural projects. The Office Action simply omits the term "architectural" when rejecting the claims. In this regard, the Office Action merely uses the term "projects" when relying on Wishnie. However, this element provides a context for the web site and is specifically claimed. Wishnie is not even remotely related to architectural projects. Further, the term "architectural" cannot be removed from the claims since it is in integral part of this independent claim. Thus, regardless of whether Burrows provides for a distributed CAD system, Wishnie is wholly unrelated and cannot be utilized to teach the claimed elements. Specifically, the folders are utilized as containers relating to architectural projects. Neither Burrows nor Wishnie teach such a claim element. In this regard, Wishnie's mere hierarchical structure of HTML files completely fails to teach, disclose, or suggest, either expressly or implicitly, containers for storing, managing and sharing files for an architectural project.

Additionally, Wishnie's folders are utilized for HTML files and not projects. In fact, an electronic search for the term "project" in Wishnie provides no results at all. Without even using the word "project", Wishnie cannot possibly teach an integrated web site directed towards projects (and more particularly architectural projects).

In response to the above arguments, the final Office Action provides:

> 10. In response to applicant's arguments against the references individually, on page 13, lines 24-25, and page 14, lines 2-3, one cannot show nonobviousness by attacking references individually where the rejections are based on combinations of references. See *In re Keller*, 642 F.2d 413, 208 USPQ 871 (CCPA 1981); *In re Merck & Co.*, 800 F.2d 1091, 231 USPQ 375 (Fed. Cir. 1986).

> 11. Applicant(s) argue on page 14, lines 9-10 and 15-16, that Wishnie is totally unrelated to a distributed CAD system, and that since the folders in Wishnie et al. are utilized for HTML files as opposed to projects, it does not read on the claimed invention. The applicant(s) arguments are not persuasive. Although Wishnie et al. is not a CAD system, it is a related in the fact that is the hierarchical organization of files for a website. Thus, it is *not* wholly unrelated to the present application. Furthermore, only the concept of utilizing folder for storing files was taken from the Wishnie et al. reference in the 103 combination, and not the storage of HTML files *only*.
>
> Applicant(s) argue on page 14, lines 4-10, that the term "architectural is an integral part of the independent claims, and that Burrows et al. cannot anticipate that. The applicant(s) arguments are not persuasive. The term archirecnural has been given the broadest reasonable interpretation. By it's nature, CAD design drawings are inherently related to some type of architectural structure, whether it is be for mechanical objects, electrical objects, buidlings, etc. Thus, the term architecnural, when used in the context of CAD systems, does not further limit CAD-based files.

Applicants respectfully traverse such conclusions in the final Office Action. While Applicants agree that one cannot show non-obviousness by attacking references individually where the rejections are based on combinations of references, the claimed invention must also be examined as a whole and whether the "whole" claimed invention would have been obvious at the time of invention (see MPEP §2142). In addition, under MPEP §706.02(j) "there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings." No such suggestion of motivation exists in either Burrows or Wishnie.

As described above, Wishnie is directed towards organizing HTML files for a web site. The final Office Action agrees with such a statement but states that Wishnie is not wholly unrelated to the present application since it is a hierarchical organization of files for a website. However, the test is not whether it is wholly unrelated to the present application but whether it is related or would have been obvious to combine Wishnie with the other reference (i.e., Burrows). Such a motivation to combine is clearly lacking from both Wishnie and Burrows.

Further, looking at the claimed invention as a "whole" (as required by the MPEP), the invention provides an online service with an integrated project workspace having folders as containers for architectural project files (where the files comprise drawings, documents, communications, and tasks) and the workspace provides content services and tools to help users manage the files. In this regard, the claims provide for an entire online service for managing architectural CAD projects including the ability to manage the folders as containers which are specifically geared and organized for architectural projects. In addition, the online service provides the ability to manage the files within the folders wherein the files are drawings, documents,

communications, and tasks related to the projects. In this regard, Burrows completely fails to describe any documents or communications whatsoever.

In addition to the above, the final Office Action submits that "only the concept of utilizing folders for storing files was taken from the Wishnie et al. reference". Relying on such a statement, it is therefore assumed that Burrows is relied upon to teach all of the remaining elements including containers for storing, managing, and sharing files for architectural projects, wherein the files comprise drawings, documents, communications, and tasks related to the architectural projects. It is further assumed that the Office Action relies on Burrows to teach an integrated project workspace that provides relevant content, services, and tools to help building, design, and construction personnel manage the files (i.e., the drawings, documents, communications, and task files) related to the architectural projects.

Burrows is specifically geared towards using CAD tools in a distributed CAD system (see col. 1, lines 5-59). In this regard, design tools that perform CAD tasks are provided on a CAD server station (see col. 1, lines 62-67). FIG. 2 of Burrows illustrates such a CAD server system that supports design tool executables (programs) 37 and design tool libraries 39. As illustrated in FIG. 3, the CAD system runs on the server and the user can gain access to the programs (i.e., the design tools) from the client station over the internet (see col. 4, lines 33-40). Further, access to the programs is achieved using "form" that define parameters for a CAD task. However, absent from the Burrows disclosure is any reference to the files as claimed (i.e., files that comprise drawings, documents, communications, and tasks) or the storage of any such files in containers or otherwise.

Thus, contrary to the assertion in the final Office Action, Burrows merely provides the ability to using CAD tools in a distributed system. There is no teaching or suggestion, implicit or explicit, for the files, folders, or organization as claimed. Burrows also fails to describe any such files, folders, or organization with respect to architectural projects (as claimed). In fact, an electronic search in Burrows for the term "project" provides no results. Without even describing a project or mentioning the word "project", Burrows cannot possibly teach or suggest files (that comprise drawings, documents, communications, and tasks) for an architectural project. Instead, Burrows merely provides for using a CAD tool in a distributed environment. Further, Wishnie does not cure Burrows' deficiency (since it merely teaches utilizing folders for storing files).

In view of the above, Applicants submit that Independent claim 1 is in condition for allowance.

B. Claims 2-45

In paragraphs (1)-(2) of the Office Action, claims 2, 3, 5, 6, 7, 14, 16, 17, 19, 20, 21, 28, 29, 31, 32, 34, 35, 36, 43, and 44 were rejected under 35 U.S.C. §102(e) as being anticipated by Burrows et al., U.S. Patent No. 6,397,117 (Burrows). In paragraphs (3)-(4) of the Office Action, claims 4, 9, 15, 18, 23, 30, 33, 38, and 45 were rejected under 35 U.S.C. §103(a) as being unpatentable over Burrows et al. as applied to claims 2, 16, and 31, and further in view of Wishnie et al., U.S. Patent No. 6,148,311 (Wishnie). In paragraph (5), claims 10, 11, 24, 25, 39, and 40 were rejected under 35 U.S.C. §103(a) as being unpatentable over Burrows et al. as applied to claims 2, 16, and 31, and further in view of Lowell, U.S. Patent No. 6,381,632 (Lowell). In paragraph (6) of the Office Action, claims 8, 22, and 37 were rejected under 35 U.S.C. §103(a) as being unpatentable over Burrows et al. as applied to claims 2, 15, and 31, and further in view of Robertson, U.S. Patent No. 6,269,369 (Robertson). In paragraph (7) of the Office Action, claims 12, 26, and 41 were rejected under 35 U.S.C. §103(a) as being unpatentable over Burrows et al. as applied to claims 2, 16, and 31, and further in view of Yasue, U.S. Patent 6,289,345 (Yasue). In paragraph (8) of the Office Action, claims 13, 27, and 42 were rejected under 35 U.S.C. §103(a) as being unpatentable over Burrows et al. as applied to claims 2, 16, and 31, and further in view of Burridge, U.S. Patent No. 6,430,567 (Burridge). In paragraph (9) of the Office Action, claim 1 was rejected under 35 U.S.C. §103(a) as being unpatentable over Burrows et al. and further in view of Wishnie.

Applicants respectfully traverse these rejections.

Specifically, claims 2, 16, and 31 were rejected as follows:

> In considering claims 2, 16, and 31:
> Burrows et al. discloses a computer-implemented apparatus, a method, and an article of manufacture, each comprising:
> accessing architectural project information using an interactive web site hosted on a server wherein one or more areas of the interactive web site provide for:
> modification and organization of:
> a display of the interactive web site (see Fig.2, Display 42; col. 4, lines 14-26);
> site members of the interactive web site (see Fig. 3, Users 26);
> one or more projects including storing, organizing, and displaying drawings and text files in project folders and standard folders (see Fig. 2,Design Tool Executables – programs – 37; col. 4, lines 5-15 and lines 33-40) [note: the programs must stored in some type of program on the server computer 30 in order to be utilized by the user]; and

project members of the one or more projects including defining access permissions for project members to access the project folders, the standard folders, the drawings, and the text files (see Fig. 4, Steps C1 and C2; col. 5, lines 16-20 and lines 58-69).

Applicants traverse the above rejections for one or more of the following reasons:

(1) Burrows fails to teach, disclose or suggest an area of a web site that provides for the modification and organization of site members of the web site;

(2) Burrows fails to teach, disclose or suggest projects including an area of a web site that provides for the modification and organization of projects including storing, organizing and displaying drawings and text files;

(3) Burrows fails to teach, disclose or suggest folders including an area of a web site that provides for the modification and organization of projects in project folders and standard folders; and

(4) Burrows fails to teach, disclose or suggest project members of one or more projects.

Independent claims 2, 16, and 31 are generally directed to accessing architectural project information using an interactive web site. The web site has various areas. One such area provides for the modification and organization of site members of the web site. Another area provides for the modification and organization of one or more projects including storing, organizing, and displaying drawings and text files in project folders and standard folders. Additionally, a third area provides for the modification and organization of project members of projects including defining access permissions for project members to access project folders, standard folders, drawings, and text files.

To teach each of the above elements, the Office Action relies on Burrows. Specifically, to teach an area of the web site that provides for the modification and organization of site members, the Office Action sites Burrows Fig. 3, users 26. However, item 26 of Fig. 3 merely illustrates a user connected to a network. Nowhere is there any description in Burrows (either within FIG. 3, the other figures, or the text) that allows for the organization and modification of site members. Further, nowhere in Burrows is there any reference to site members of a web site whatsoever. The use of Burrows' passwords in relation to the present claims is addressed in further detail below.

To teach an area of the web site for the modification and organization of one or more projects including storing, organizing, and displaying drawings and text files in project folders and standard folders, the Office Action relies on Burrows Fig. 2, design tool executables 37, col. 4, lines 5-15 and lines 33-40. As described above, Applicants note that an electronic search of Burrows for the term "project" provides no results. Without even mentioning the word "project", Burrows

cannot possibly teach various claim elements that all utilize the word "project". Further, the use of design tool executables 37 does not even remotely suggest modifying and organizing projects in project folders and standard folders. Burrows' design tool executables are executable files used to perform a desired CAD task (see col. 5, lines 13-20; col. 5, lines 58-60; col. 6, lines 5-27). For example, to design an integrated circuit, a user may use a CAD tool with associated executable libraries that enable the designing of a memory cell for incorporation into an integrated circuit design (see col. 5, lines 13-20). In view of such an explanation by Burrows, the design tool 37 used to complete a CAD task does not teach or disclose, implicitly or explicitly, projects (or an area of a web site that provides for modification and organization of projects) that include storing, organizing, and displaying drawings and text files in project folders and standard folders.

In response to the above arguments, the final Office Action provides:

> Applicant(s) argue on page 16, lines 9-11 and 16-18, that Burrows et al. fails to reference any site members of a web site, and that since the word "project" does not appear anywhere in Burrows et al., it does not read on the claimed invention. The applicant(s) arguments are not persuasive. The users of the files, 57, in Fig. 3 of Burrows et al. clearly show three different site members who have their own respective access to the CAD server, even they have not be named "site members" within the reference. Additionally, the CAD tasks of each user have been interpreted as projects, even though the word "project" isn't being specifically mentioned.

Applicants respectfully traverse such statements. In Applicants' prior argument, Applicants did not state "that Burrows et. al. fails to reference any site members of a web site". As stated above, Applicants submit that Burrows fails to provide an area of a web site that provides for the modification and organization of site members of the interactive web site (as claimed). The users of Burrows' Fig. 3 may be site members. [However, please note that no "membership" or "subscription" of any sort is defined or suggested in Burrows. Instead, Burrows merely identifies a user having a password to gain access to a web page (see col. 5, lines 5-12).]. However, there is no description that provides an area of the web site (or a web page) that provides the ability to manage and organize such site members. The mere use of passwords does not even remotely refer to such capabilities. For example, the modification and organization of Burrow's users may be defined by a server administrator through a server mechanism and not via the web site. However, there is no description, implicit or explicit, regarding how such users are modified or organized in Burrows.

In addition, Burrows fails to even teach the use of any folders. An electronic search for the term "folder" in Burrows provides no results. The claims specifically provide for both project folders and standard folders and the organizing of projects and files within such folders. Burrows

does not even remotely teach such folders or file/project organization. The final Office Action failed to respond to this argument.

In addition to the above, the Office Action relies on fig. 4, steps C1 and C2; col. 5, lines 16-20 and lines 58-69 to teach the claimed element of an area of the web site that provides for the modification and organization of project members of the one or more projects including defining access permissions for project members to access the project folders, the standard folders, the drawings, and the text files. As claimed, there is both a site members area and a project members area. Burrows merely provides for providing suitable security clearance (e.g. passwords) so that only authorized users gain access to a web page (see col. 5, lines 8-12). Thus, Burrows simply provides that access to a web page may be based on a password. However, Burrows fails to describe an area of a web site that provides for the modification and organization of site members and another area that provides for the modification and organization of project members. The mere use of passwords in determining if a user has access to a web page is completely different and distinguishable from organizing such users in an area of a web site.

In response to the above arguments, the final Office Action provides:

> Applicant(s) argue on page 17, lines 10-14, that Burrows et al. fails to describe a separate site members area and a project area, thus it does not read on the claimed invention. The applicant(s) arguments are not persuasive. In the claimed language, there has been no distinction made between site members and project members, as the site members have not been described in the independent claims. In fact, project members are only mentioned in the independent claims, leading one to believe that site member can be, and are, project members, since the dependent claims refer to defining access permissions and such for the site members *only*.

Applicants respectfully traverse such statements. Firstly, the independent claims provide for both "site members" (see line 6 of independent claim 2) and "project members" (see lines 9-11 of independent claim 2). In this regard, the independent claims provide that an area of the web site provides for the modification and organization of site members. The independent claims also provide that an area of the web site provides for the modification and organization of project members of one or more projects. Such a project member modification and organization area includes the ability to define access permissions for project members to access project folders, standard folders, drawings, and text files. Thus, contrary to the assertion in the final Office Action, the independent claims mention and specifically provide for both site members and project members.

Further, consistent with the final Office Action, Applicants agree that site members may in fact be project members. In fact, to gain access to the web site (and thereby access to information on the web site), project members may be required to be site members. In this regard, as claimed, there is an area of the web site that provides for the modification and organization of the site members. However, the claims also recite an area of the web site that provides for the modification and organization of project members OF THE ONE OR MORE PROJECTS. Such an area includes defining access permissions for project members to access the project folders, standard folders, drawings, and text files. The final Office Action equates CAD tasks of each user as projects. However, Burrows fails to provide any capability or description for defining access permissions for such users to access the tasks. In addition, Burrows lacks any discussion regarding an area of a web site that may be used to modify and organize such users and their access permissions to such tasks.

In addition to the above, the final Office Action asserts that the dependent claims refer to defining access permissions for the site members *only*. Applicants agree that the dependent claims specifically provide for defining access permissions for the site members (see for e.g., dependent claims 3, 8, and 12). However, the reason for defining such access permissions for site members in the dependent claims is because the capability to define access permissions for project members already exists in the independent claims. Accordingly, it would be redundant to provide for further defining access permissions for the project members in the dependent claims. Thus, the assertions relied upon in the final Office Action are illogical and inconclusive with respect to the presently claimed invention.

In addition, Burrows describes that once a CAD task parameter form has been completed, security checks are performed, and subject to correct authorization, a job description is created (see col. 5, lines 58-62). However, contrary to the assertion in the Office Action, such a description fails to teach an area of a web site that provides for the modification and organization of project members of one or more projects. In this regard, Burrows fails to describe any area of a web site that provides the ability to organize and modify project members of one or more projects. The mere ability to perform a security check does teach a web site where access permissions may be defined on a project folder basis, standard folder basis, drawing basis, and/or text file basis (as claimed). Such a defining is completely lacking in Burrows.

In response to the above argument, the final Office Action provides:

> Applicant(s) argue on page 16, lines 28-29, and page 17, lines 19-23, that Burrows et al. fails to describe any area of a web site that provides the ability to organize and modify project members of one or more projects. The examiner has expanded upon the previous rejection to more clearly point out the inherent use of folders for storing, organizing, and displaying CAD programs (drawings and text files), as claims 2, 16, and 31).

Applicants note that the only difference between the rejection in the final Office Action and the former Office Action (with respect to claims 2, 16, and 31) is that a "note" is added that provides "the programs must be stored in some type of program on the server computer 30 in order to be utilized by the user". Applicants agree that programs must be stored on a server in order to be used. However, such a teaching still fails to teach an area of a web site that provides the ability to modify and organize site members, projects (in project folders and standard folders), and project members (of the one or more projects) as claimed. Further, even if Burrows teaches using folders for storing, organizing, and displaying CAD programs (which Applicants traverse), Burrows still fails to teach an area of the interactive web site (i.e., that is accessible to the user) for modifying and organizing site members and project members (as claimed). Burrows does not even remotely allude to such areas of a web site or a web site having the capabilities as claimed.

In addition to the above, the various elements of Applicants' claimed invention together provide operational advantages over the systems disclosed in Burrows, Wishnie, Lowell, Robertson, Yasue, and Burridge. Further, Applicants' invention solves problems not recognized by Burrows, Wishnie, Lowell, Robertson, Yasue, and Burridge.

Thus, Applicants submit that independent claims 1, 2, 16, and 31 are allowable over Burrows, Wishnie, Lowell, Robertson, Yasue, and Burridge. Further, dependent claims 3-15, 17-30, and 32-45 are submitted to be allowable over Burrows, Wishnie, Lowell, Robertson, Yasue, and Burridge in the same manner, because they are dependent on independent claims 1, 2, 16, and 31, respectively, and because they contain all the limitations of the independent claims. In addition, dependent claims 3-15, 17-30, and 32-45 recite additional novel elements not shown by Burrows, Wishnie, Lowell, Robertson, Yasue, and Burridge.

III. CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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